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Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

LINWEI DING,

Defendant.

No. 3:24-cr-00141-VC

**DECLARATION OF ROLAND CHANG IN
SUPPORT OF UNITED STATES'
OPPOSITION TO DEFENDANT'S MOTION
PURSUANT TO *DAUBERT* TO EXCLUDE
THE EXPERT TESTIMONY OF DR. ADAM
M. SEGAL, OR, IN THE ALTERNATIVE,
MOTION *IN LIMINE* TO EXCLUDE THE
EXPERT TESTIMONY OF DR. ADAM M.
SEGAL (NO. 19)**

The Honorable Vince Chhabria
Courtroom 4, 17th Floor

Trial Date: October 14, 2025
Pretrial Conf.: September 23, 2025

I, Roland Chang, declare and state as follows:

1. I am an Assistant United States Attorney in the Northern District of California assigned to the above-captioned case. I make this declaration in support of the United States' Opposition to the Defendant's Motion Pursuant to *Daubert* to Exclude the Expert Testimony of Dr. Adam M. Segal, Or, In

1 the Alternative, Motion *in Limine* to Exclude the Expert Testimony of Dr. Adam M. Segal.

2 2. Attached hereto as **Exhibit A** is the curriculum vitae for Dr. Adam M. Segal.

3 I declare under penalty of perjury under the laws of the United States of America that the
4 foregoing is true and correct to the best of my knowledge.

5 Executed this 16th day of September 2025 in San Francisco, California.

6 /s/ Roland Chang

7 ROLAND CHANG

8 Assistant United States Attorney
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Exhibit A

Adam M. Segal

Council on Foreign Relations
58 East 68th Street
New York, New York 10021
Phone: (O) 212-434-9745; (M) 617-877-7568
Email: asegal@cfr.org; adamsegal.home@gmail.com

Internationally recognized expert and author on Chinese technology policy and the politics of cyberspace, with connections in business, government, and academia in the United States, China, Australia, India, and Europe. I direct an influential cybersecurity initiative and have advised the U.S. government and Fortune 500 corporations on Chinese innovation and technology strategy.

Experience

Council on Foreign Relations, New York, New York

2014-2023, 2024- Director, Digital and Cyberspace Policy Program

2003-2104 Maurice R. Greenberg Senior Fellow in China Studies

2001-2003 Olin Fellow, Asia Studies

U.S. State Department, Bureau of Cyberspace and Digital Policy

2023-2024 Senior Advisor

Union of Concerned Scientists, Cambridge, Massachusetts

1999- 2001 Arms Control Analyst, China Project

Books

The Hacked World Order: How Nations Fight, Trade, Maneuver, and Manipulate in the Digital Age, PublicAffairs, 2016 (revised paperback 2017)

Advantage: How American Innovation Can Overcome the Asian Challenge, W.W. Norton & Company, 2011 (paperback 2013)

Digital Dragon: High Technology Enterprises in China, Cornell University Press, 2003 (paperback 2010)

Selected Articles and Reports

"What If China Wins the AI Race?" *Foreign Affairs*, June 13, 2025 (with Sebastian Elbraum)

"The Impact of Techno-libertarians on Trump's Foreign Policy [in Spanish]," *Vanguardia Dossier*, June 12, 2025

"Brave New Techno-Nationalist World," *Foreign Policy*, June 4, 2025 (with Tobias Feakin)

"The Future of Technology Deterrence in the Indo-Pacific," Perry World House UPENN, May 19, 2025

"Unpacking TSMC's \$100 Billion Investment in the United States," *Asia Unbound*, March 4, 2025 (with David Sacks)

"China Has Raised the Cyber Stakes: The 'Salt Typhoon' Hack Revealed America's Profound Vulnerability," *Foreign Affairs*, January 21, 2025

"What's Next for TikTok: Ban, Sell, or Presidential Reprieve?" *Net Politics*, December, 9, 2024 (With Zoe Moore)

"Artificial Intelligence Priorities for the Next Administration," *CFR*, November 26, 2024 (with Sebastian Elbraum)

"From Defending the Open Internet to Confronting the Reality of a Fragmented Cyberspace: Reflecting Upon Two CFR Reports on U.S. Goals in Cyberspace," *Lawfare*, August 11, 2024

Confronting Reality in Cyberspace: Foreign Policy for a Fragmented Internet, Council on Foreign Relations Independent Task Force, July 2022 (with Nate Fick and Jamie Miscik)

"The Internet Is Fragmented. What Should the United States Do Now?" *Net Politics*, July 19, 2022

"How Should U.S. Cybersecurity Policy Develop?" *Net Politics*, July 14, 2025

"A New U.S. Foreign Policy for Cyberspace," *Net Politics*, July 12, 2025

"Raising US-South Korean Cybersecurity Cooperation to the Next Level," in *Two Presidents, One Agenda: A Blueprint for South Korea and the United States to Address the Challenges of the 2020s and Beyond*, Wilson Center, May 2022

"The US-China Struggle for Digital Supremacy [in French]," *Herodote*, January 2022

“China’s Search for Technological Self Reliance,” *China Leadership Monitor*, December 1, 2021

“Strategic Stability in Cyberspace,” U.S Institute of Peace, April 2021

“Huawei, 5G, and Weaponized Interdependence,” in Daniel Drezner, Henry Farrell, and Abraham Newman, eds., *The Uses and Abuses of Weaponized Interdependence* (Brookings 2021)

“Globalized Innovation and Great Power Competition: The US-China Tech Clash,” in Jacques deLisle and Avery Goldstein eds., *After Engagement: Dilemmas in U.S.-China Security Relations* (Brookings, 2021) [with Elsa Kania]

“The Encryption Debate in China: 2021 Update,” Carnegie Endowment for International Peace [with Lorand Laskai]

“The Coming Tech Cold War With China,” *Foreign Affairs*, September 2020

“China’s Vision for Cyber Sovereignty and the Global Governance of Cyberspace,” National Bureau of Asia Research Special Report No. 87, August 2020

“Peering into the Future of Sino-Russian Cybersecurity Cooperation,” *War on the Rocks*, August 2020

“China’s Pursuit of Cyberpower,” *Asia Policy*, April 2020

“China: Heeding Les Gelb’s Principles,” *Journal of Democracy*, Spring 2020 [with Liz Economy]

“China-Russia Cybersecurity Cooperation,” New Challenges for the United States, Center for New American Security, February 2020

“China, Science and Technology, and Hybrid Competition,” Mobilizing Insights in National Defence and Security, Canadian Department of National Defence, November 2019

“A Conflict Without End? The US-China Tech War,” *RSIS Commentaries*, October 23, 2019

“America faces fresh challenges to technology innovation leadership,” *The Hill*, September 18, 2019 (with James Manyika and William McRaven)

Innovation and National Security: Keeping Our Edge, Council on Foreign Relations Task Force, September 2019 (with James Manyika and William McRaven)

"The Right Way to Deal with Huawei," *Foreign Affairs*, July 11, 2019

"Seizing Core Technologies: China Responds to U.S. Technology Competition," *China Leadership Monitor*, June 1, 2019

The Encryption Debate in China, Carnegie Endowment for International Peace, May 30, 2019 (with Lorand Laskai)

"U.S. Offensive Cyber Operations in a China-US Military Confrontation," in *Bytes, Bombs, and Spies: The Strategic Dimensions of Offensive Cyber Operations* (Brookings, 2019)

"What Do the Huawei Indictments Mean for the Future of Global Tech," *Foreign Policy*, Feb. 2, 2019

A New Old Threat: Countering the Return of Chinese Industrial Cyber Espionage, Council on Foreign Relations, December 6, 2018 (with Lorand Laskai)

"Will China Hack the U.S. Midterms?" *New York Times*, October 5, 2018

"When China Rules the Web," *Foreign Affairs*, September/October 2018

Hacking for Cash, Australian Strategic Policy Institute, September 25, 2018

"How the tech industry got caught in the Trump-China trade crossfire," *Wired*, July 5, 2018

"Trust Wars: Dangerous Trends in Cyber Conflict," *War on the Rocks*, January 16, 2018 (with Neal Pollard and Matt Devost)

"Bridging the Cyberspace Gap - Washington and Silicon Valley," *Prism*, Volume 7, no 2 (December 2017)

"Net Reach," American Academy in Berlin, September 2017

"The Hacking Wars Are Going to Get Much Worse," *New York Times*, July 31, 2017

"Chinese Cyber Diplomacy in A New Era of Uncertainty," *Aegis Policy Series*, Hoover Institution, June 2017

"How China Is Preparing for Cyberwar," *Christian Science Monitor*, March 20, 2017

"How Silicon Valley and Washington Can Be Friends Again," *Fortune*, February 2, 2017 [with Alex Grigsby]

"Recommendations for Healing the DC-Silicon Valley Rift," *Lawfare*, January 26, 2017

"Rebuilding Trust Between Silicon Valley and Washington," *Council Special Report*, January 2017

"China, Encryption Policy, and International Influence," *Hoover Institution Aegis Paper Series*, November 28, 2016

"How the Next U.S. President Can Contain China in Cyberspace," *Journal of International Affairs*, November 3, 2016 [with Robert K. Knake]

"Using Incentives to Shape the Zero-Day Market," *Cyber Brief*, September 2016

"What's the Future of Chinese Hacking?" *Motherboard*, July 30, 2016

"Cyber Attacks Blurring Borders Between War and Peace," *Brink*, June 28, 2016

"Reducing and Managing U.S.-China Conflict in Cyberspace," in U.S.-China Relations in Strategic Domains, National Bureau of Asian Research, April 2016 [with Tang Lan]

"How to Break the Deadlock over Data Encryption," *Washington Post*, March 13, 2016 (with Alex Grigsby)

Cyber Conflict After Stuxnet: Essays From the Other Bank of the Rubicon, (New York: Cyber Conflict Studies Association, 2016) [with Hannah Pitts]

"Can the United States and China De-Conflict in Cyberspace?" *War on the Rocks*, April 27, 2016

"Restriction and Resistance," *The Cipher Brief*, April 26, 2016

"China Is Watching the FBI-Apple Battle Very Closely," *Defense One*, March 4, 2016

Congressional Testimony

"U.S. Responses to the China Cyber Challenge: Diplomatic Efforts to Establish Norms in Cyberspace," U.S. China Economic Security Review Commission, February 17, 2022

“China’s Alternative Cyber Governance Regime,” U.S. China Economic Security Review Commission, March 13, 2020

“Chinese Technology Development and Acquisition Strategy and the U.S. Response,” House Subcommittee on Financial Services, Monetary Policy, and Trade, United States House of Representatives, December 12, 2017

“The United States, China, and the Globalization of Science and Technology,” Committee on Foreign Affairs, Subcommittee on Oversight and Investigations, United States House of Representatives, 1st Session, 112th Congress, November 2, 2011

“Chinese Technology Policy and American Innovation,” U.S.-China Economic and Security Review Commission, June 15, 2011

“Innovation, Espionage, and Chinese Technology Policy,” House Foreign Affairs Subcommittee on Oversight and Investigations, United States House of Representatives, 1st Session, 112th Congress, April 15, 2011

“The Civilian High-technology Economy: Where is it heading?” U.S.-China Economic and Security Review Commission, March 16, 2006

Expert Testimony

USA v Linwei Ding, Northern District of California, for the Assistant United States Attorney, January 2025-present

USA v Panggang Group, Northern District of California, for the Assistant United States Attorney, August 2024-present

USA v Fujian Jinhua, Northern District of California, for the Assistant United States Attorney, February 2021—March 2022

Advisory and Teaching Positions

Adjunct Professor, Columbia University, Spring 2016-present

Board Member, Cyber Conflict Studies Association, November 2010-January 2021

Visiting Fellow, Hoover Institution, Stanford University, June-July 2015

Member of Advisory Board, China Research Center, Japan Science and Technology Agency, 2006-2009

Visiting research scholar at the Institute of Economics and Management, Tsinghua University, Beijing; and Shanghai Academy of Social Sciences, 1995-1998

Selected Talks and Briefings

Briefings at Office of the Secretary Defense, Defense Science Board, National Intelligence Council, Central Intelligence Agency, Intelligence Science Board, Department of Commerce, State Department, Senate Foreign Affairs Committee, House Foreign Affairs Committee, and US Patent Office.

Invited talks at Aspen Ideas Festival, Conference Board, Global Network Initiative, Information Technology Industry Council, US Chamber of Commerce, and to multiple corporate conferences.

Invited talks at Cornell, Georgia Tech, Harvard, Keio, MIT, North Carolina, NYU, Oxford, Princeton, Stanford, Tel Aviv, Tokyo, and Yale universities.

Languages

Mandarin Chinese

Education

2000	Ph.D., Cornell University, Department of Government
1995	M.A., Cornell University, Department of Government
1993	M.A.L.D., The Fletcher School of Law and Diplomacy, Tufts University
1990	B.A., Cornell University, Department of Government, <i>cum laude</i>